

IN THE UNITED STATES DISTRICT COURT
FOR THE NOTHERN DISTRICT OF MISSISSIPPI

OXFORD DIVISION

Non-Jury Trial Requested

Amended Complaint

RICHARD MOORE Pro Se

PLAINTIFF

V.

CASE NO. 3:21-cv-00080

DEFENDANTS

JIMMY EDWARDS, SHERIFF UNION COUNTY MS

UNION COUNTY SHERIFF'S DEPARTMENT

BLAKE SMITH, DEPUTY UNION COUNTY SHERIFF'S
DEPARTMENT & CHIEF OPERATIONS MANAGER OF ALPINE MS
VOLUNTEER FIRE DEPARTMENT.

KEITH ROBERTS, CHIEF ALPINE MS VOLUNTEER FIRE
DEPARTMENT

Curt Clayton Union County Mississippi EMS

108 E Main Street

New Albany, MS 38652

Chris Childers Union County Mississippi Justice Court Judge

300 Carter Ave

New Albany, MS 38652

Chris Chappelle Union County Mississippi deputy sheriff

300 Carter Ave

New Albany, MS 38652

PARTIES IN THIS COMPLAINT

PLAINTIFF:

MOORE, RICHARD, M

1306 HWY 9 NORTH BLUE SPRINGS, MS 38828 UNION COUNTY
MISSISSIPPI

MAILING ADDRESS 4222 PARADISE LANE, PHOENIX, AZ 85053

Email: tcbkracker@gmail.com

DEFENDANTS:

1. EDWARDS, JIMMY

300 CARTER AVE.

NEW ALBANY, MS 38652

UNION COUNTY MISSISSIPPI

2. SMITH, BLAKE

300 CARTER AVE.

NEW ALBANY, MS 38652

UNION COUNTY MISSISSIPPI

3. ROBERTS, KEITH

1888 COUNTY ROAD 171

BLUE SPRINGS, MS 38828

UNION COUNTY MISSISSIPPI

4. UNION COUNTY MISSISSIPPI SHERIFF'S DEPARTMENT

300 CARTER AVE.

NEW ALBANY, MS 38652

BASIS FOR JURISDICTION

Claim arises under the constitution, law, or treaties of the United States.

False arrest

False imprisonment

Violation of 14th amendment rights

Violation of 42 U.S.C 1983

Venue is appropriate in this court because.

:

Defendants acted under the color of law and/or their official capacity as Sheriff, Deputy Sheriff and Fire Chief, respectfully.

STATEMENT OF CLAIM:

Places of occurrence: 1888 County Road 171, Blue Springs, MS 38828

300 Carter Ave. New Albany, MS 38652

DATE OF OCCURRENCE:

12/17/2017 - 12/18/2017

FACTS:

On December 17th, 2017, while in my front yard at 1306 Hwy 9 North Blue Springs, MS 388228. I was being aggressively harassed by a group of 20 or more vehicles. The drivers were driving by my house extremely slow and at times came to a complete stop. They were blowing their horns, shouting obscenities, making neck cutting motions with their hands, racing their engines with loud exhaust systems.

I called 911 and approx. 45 minutes later two Union County deputies arrived. This seemed odd due to the nature of the urgent complaint. Minutes earlier, prior to their arrival the stalking stopped. The deputies came inside my house, and I explained exactly what had been going on for over an hour. I asked the deputies if they had ever heard of or had knowledge of any groups of people organizing and committing these types of crimes. I was met with a confused look and a very stern no.

Deputy Blake Smith sarcastically asked me if they were doing it now. They were treating me as if I were suffering from some type of psychosis. They did not take a statement nor fill out a formal complaint as I had suggested several times. They simply left and that was it. Immediately after the departure of the deputies the stalking resumed with a fever pitch. They became more aggressive including driving through my looped driveway and slinging gravel all over my parked car resulting in a broken side window on the car.

I called 911 several times again and after an hour of being tortured one deputy arrived. This time Deputy Blake Smith pulled into the Alpine Volunteer fire department parking lot. This is next to my property and is where most of the people involved were turning around and organizing. It became obvious that Fire Chief Keith Roberts oversaw this group.

Deputy Blake Smith motioned for me to come over to the fire department parking lot which had just emptied of all the

vehicles involved in the stalk. Once I left my property and got close to the deputy I was immediately slammed against his car and handcuffed. I was brutally forced into the deputy's car and my head was slammed against the side of the car. I still suffer from vision loss and severe pain in the right side of my head since this assault. I was completely compliant with the deputy, but that made no difference, I was told I was under arrest for public intoxication. I pleaded with the deputy to take me to the hospital, and I would be more than happy to have all toxicological tests ran which would prove that I was in no way under the influence of anything. This request was repeatedly denied. I was booked into the county jail and was refused a telephone call to advise my attorney. I was denied my blood pressure medications as well as my anxiety medications. I was not allowed to make bond nor call a bondsperson. I begged for my medication and then was moved to an isolation cell. I was extremely cold, and no blanket provided, no bed, no chair, and a hole in the concrete floor to use for a toilet. I had soiled myself from the head injury and could not even clean myself. For over 13 hours deputies would come by and taunt me and laugh at me. I was denied food and water. I begged for water. Finally, I was able to make bond and had to pay a bondsperson to be released and to take me back home. I called the Federal civil rights enforcement office the following day and lodged my complaint. Nothing has been done nor did I ever receive any follow up or communication from them. I also called Sheriff Jimmy Edwards and informed him that I had made a complaint.

Edwards was very abusive and belligerent and was laughing at me and even made the statement "do you need the name of a lawyer that likes to sue the PO-LICE."

On 03/13/2018 I went to trial and took the stand and told my side of the story. I simply told the truth. The case was quickly dismissed. With a judgement of Not Guilty.

INJURIES:

TRUMA TO MY HEAD AND VISION LOSS. CONSTANT RINGING AND PAIN IN MY RIGHT EAR, BLURRED VISION AS WELL AS EXTREM HEADACHES.

HAVE REMAINED UNDER CONSTEST HARASSMENT FROM THE DEFENDANTS AS DESCRIBED IN THIS COMPLAINT. I HAVE REACCURING NIGHTMARES ABOUT THE INCIDENT IN THIS COMPLAINT. CONSTANT SLEEP DEPRIVATION AND THE ABILITY TO GET EMPLOYMENT HAVE BEEN IMPOSSIBLE. THE TPURTORE I HAVE AND CONTINUE TO GO THROUGH IS AN DIRECT ASSAULT ON MY CIVIL LIBERTIEES. "LIFE, LIBERTY AND THE PURSUITE OF HAPPINESS HAS AND COMTINUE TO BE DENIED.

RELIEF:

The plaintiff herby request Punitive and Constitutional damages in the amount of one million dollars.

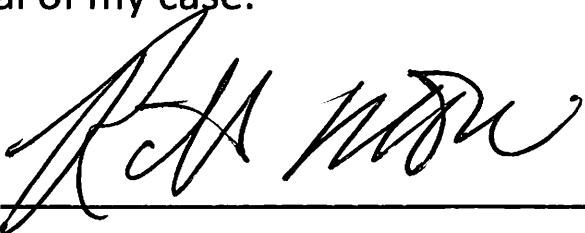
CLOSING

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation;(2) is supported by existing law or by a nonfrivolous argument for extending or modifying existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

5-13-2021

Dated



Plaintiff's Signature

Name Richard Moose

1306 Hwy 9 N Blue Springs MS 38828

Address

City

State

Zip Code

662-486-4114

Telephone Number

fcbracker@gmail.com

E-mail Address

FedEx

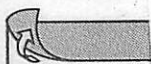
1 Open pre-sealed
purple flap.
Extremely Urgent

Place a copy of the shipping documentation
inside the package and write permanent
shipper/recipient details on an inner package
flap. Follow steps 1-4 to adhere to
the package.

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Patent pending

PEEL HERE



FROM: (662) 486-4114
Richard Moore
1306 Hwy 9 North
Blue Springs MS 38828
US

SHIP DATE: 13MAY21
ACTWT: 0.01 LB
CAD: 250979982/MSK13600
DIMMED: 15 X 10 X 1 IN
BILL SENDER

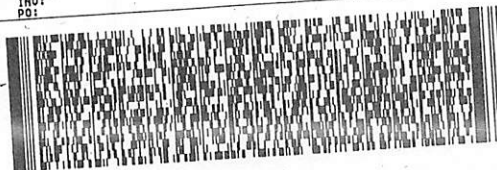
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TO Court Clerk
UNITED STATES DISTRICT COURT
911 Jackson Ave E

Oxford MS 38655

(662) 234-1971
REF: PO:

DEPT:



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